

Comment to Federal Communications Commission

Re: Proceeding: 01-75

Wrom: FAOBUZXUWLSZLK

PO Box 1232

Roswell, NM 88202-1232

donn@dfn.com

Date: April 15, 2003

This comment is in regard to the proceeding concerning the proposed PCN Coordination requirement for Part 74 users.

I have personally used a state coordinator for Part 74 filings for several years. I have never had a problem getting a good frequency free of interference to myself or others. The coordinator is diligent in keeping track of frequency requests and frequencies that are in use. I see no logical need to require broadcast stations to use a "professional" coordinator. Professional coordinators are good for major filings, such as new AM, FM and TV stations. They are a waste of money for smaller filings such as aural STLs and RPU stations. As the Chief Engineer and Operations Manager for a small combo operation, I know first hand what the cost of a "professional" coordinator would do to us.

Contrary to popular belief, smaller radio stations such as ours, are not rolling in money. The large fee that "professional" coordinators charge for such a service would put a financial bind on many smaller operations. The local coordinator is preferred over the "professional" coordinator as they usually have an intimate knowledge of the area and are familiar with current Part 74 uses. This is knowledge that the "professional" coordinators would not have. All of the computer software in existence cannot make up for the local and hands-on experience that local coordinators have and use. It is this "local" knowledge that is essential to maintaining order in the local spectrum dedicated to auxiliary Part 74 uses. To require broadcasters to obtain expensive "professional" coordination will not only endanger this process on a local basis but is a slap in the face and an insult to the local coordinators who are experienced in the areas they serve and are diligent in maintaining the necessary information necessary to proper spectrum management. Would you like being told that your services are not good enough and that you are not professional enough? I think not.

When broadcasters see the costs that would be involved in getting "professional" coordination, there is the strong possibility that they would just take their chances and operate an unlicensed Aural STL or RPU. This would cause interference to other licensed stations and complaints.

While I agree with the allowance of digital modulation in the BAS bands and other provisions of the changes, the requirement for "professional" coordination is unnecessary, unneeded and will just put many smaller broadcasters in financial binds when it comes to wanting to get an aural STL or RPU license. There are many coordinators in the country who would do a better job at coordinating frequencies than any "professional" company could ever hope of doing. Codifying this requirement would just be a way of subsidizing the bottom line of these companies. Please omit the "professional" coordination requirement from the rules. But, if the Commission insists on codifying these rules, the Commission has the responsibility to see that there are alternatives to the existing companies for obtaining "professional" coordination. Make it possible for existing local coordinators to become "professional" in the eyes of the Commission.